

Welcome to the Dalet Privacy Notice - Updated August 2018

This Privacy Notice is designed to help you understand everything you need to know about the what, why and how's of our data gathering and processing operations, and what your legal rights are.

We hope you'll take some time to read this document; we've tried to keep it all as simple as possible and we will keep you informed if there are any changes to the way we process your personal data in the future, before making them.

Dalet S.A. and its affiliates take its responsibility of protect your data very seriously and we advise you to familiarize yourself with our practices – If there's anything in this policy you don't understand or if you want to ask any questions, please feel free to contact us using any of the details below.

Who are we?

We are Dalet S.A. a company registered in France at 16 Rue Rivay, Levallois-Perret FRANCE 92300, and its affiliates (collectively "Dalet"). In this document Dalet will sometimes be referred to as "we".

What kind of personal data might we ask you to provide?

Dalet will only ever ask for personal data if it is required for a specific purpose; with that in mind we have created a full list of all the kinds of personal data that we may ask you to provide in order to achieve those purposes. The kinds of personal data we may collect are:

Data subject type:	Data categories (some applicable only in certain countries):
Job applicant	Names, email, usernames, telephone, address, work experience, education history
Customer / Client / End user / Candidate	Names, email, telephone, usernames, job title
Subscriber / Prospect	Names, email, usernames, telephone, job title,
Professional contact / Agent / Reference	Name, email, telephone, usernames, address
Supplier	Names, email, telephone, address, VAT information
Sub-Contractor	Names, address, DOB, telephone, email, usernames, work experience, education history, NI, social security information, bank details, VAT information, passport, driver's license, next of kin, children, health, insurance information, national identification documents, criminal background check

Why do we collect personal data?

We will use personal data firstly to fulfil any contractual obligations that exist between us and yourself; where we request personal data be provided to meet the terms of any such contract you will be required to provide the relevant personal data or we will not be able to deliver the goods and/or services you want. In such cases the lawful basis of us processing the personal data is that it is necessary for the performance of a contract.

We may also process your personal data in accordance with our legitimate business interests; this is on the considered measure that we need the personal data to achieve the various purposes and that it could be reasonable for an individual to expect their data to be used for those purposes.

Our data processing activities conducted on the lawful basis of 'legitimate interests' are:

- To provide you with goods and services you are looking for
- To inform you of goods and services we provide that may be of interest,
- To inform you of other goods and services we provide, or offers that may interest you (direct marketing)
- To send notifications on subjects you have subscribed to, or otherwise asked us to keep you informed of

- To improve the quality of the services we offer, and to better understand our customers' needs by requesting feedback, or requesting you review the services we have provided, or we may send survey forms that we ask you to complete
- To notify you of any changes to the goods and/or services we provide, or have provided, that may affect you
- To allow us to understand the scale and range of our customer base; for statistical analysis and market research
- To allow us to support and maintain our products in active service
- To provide reference information to third party organisations where you request us to do so
- Improve website so content is delivered more efficiently
- To investigate any insurance claims
- To protect the company's assets

We may also process your personal data in order for Dalet to comply with our various legal obligations; this might include:

- Providing for financial commitments between us and yourself, or to relevant financial authorities
- Complying with industry regulatory requirements and any self-regulatory schemes
- Carrying out required business operations and due diligence; e.g. administration, security, reorganisations, investment or corporate/asset sales
- Cooperating with relevant authorities for reporting criminal activity, or to detect and prevent fraud

Where we process special categories of personal data, other than where we have your consent to do so we shall be processing this data on one or more of the following lawful basis:

- It is necessary for the purposes of carrying out the obligations and exercising specific rights of the controller or of the data subject in the field of employment and social security and social protection law

Where did we obtain your personal data?

Other than collecting data directly from you;

We may gather personal data from sources including:

- Technical sources that gather data over time when you visit our online platforms
- From third party organisations, which can mean your personal data has been provided directly by another company for a specific purpose, or where you may have accessed our platforms through a third party online service

If you would like more information about how Dalet uses internet cookies please see our [cookies policy](#)

Who might we share your information with?

We may share your personal data with the other members of our group of companies, which includes any subsidiary, affiliate, or the holding company of Dalet.

In order to achieve the above stated purposes for which we process your personal data, we may need to share your personal data with various third-party service providers who act as data processors.

We may share your personal data with third party organisations acting as data controllers or with specific individuals, groups or other organisations who act as neither data controllers nor data processors, but only where we are either legally require to do so by law or where doing so is necessary to achieve the intended stated purpose of processing the data

In the event that we sell or reorganise our business, or if otherwise required by law or by an authorised regulator, we may transfer your personal data as a part of the general business data to the relevant parties.

Where is my data going to be stored?

Dalet as a part of its standard business practices may be required to transfer your personal data to countries outside the European Union (EU), or to organisations who intend to transfer the data outside the EU. Where such transfers of data take place, we shall ensure that at least one of the following control measures are in place:

- a) The data transfer is necessary in order to fulfil a contract between the data controller and you, or to satisfy pre-contractual requirements that have been requested by you
- b) We have gathered your specific consent before the transfer takes place, after making you aware of any risks involved,
- c) Contracts are in place between the parties involved that ensure the recipient organisation has a suitable standard of data protection in place

How long will we keep your data for?

We will keep your personal data only for as long as required in order to achieve the purposes for which it was gathered, in line with this privacy notice.

For determining when personal data should be erased we shall take into consideration the amount of and sensitivity of the personal data we have, the amount of harm that could be caused by a data breach, the benefits of the purposes the data is being used for and any legal requirements that we are bound to.

You may request that we erase your personal data at anytime, though in cases where there is a remaining relevant or legal reason why we are required to keep the data we may opt to restrict the amount of processing being conducted to what is absolute necessary in line with your legal rights in order to minimise the impact the processing will have.

Where the lawful basis of our processing is based on protection of vital interests and insofar any relevant health and safety obligations apply, Dalet will retain your personal data for 40 years.

Your Rights, Our Responsibility

There are several rights granted to you immediately upon providing us with your personal information; some of these are mentioned above. We'd like you to know that at Dalet we take your rights as a Natural Person seriously and will always conduct ourselves in a way that is considerate of our responsibility to serve your legal rights.

You have the Right of Access

This grants you the right to confirm whether or not your personal data is being processed, and to be provided with relevant details of what those processing operations are and what personal data of yours is being processed.

If you would like access to the personal data we have about you, we ask that you contact us by using any of the details below.

The Right to Rectification

This one is fairly straight forward; if you notice that the data we have about you is inaccurate or incomplete, you may request we rectify the mistake. We will make every effort to respond to requests of this type immediately.

The Right to Objection

The right to object is a basic freedom all democracies enjoy. If you wish to object to the way we use, or have used, your personal data you may do so freely.

The Right to Portability

This is a legal right afforded to you that states we must pass on all of the details you have provided to us in a machine-readable format, either to your or to another provider of your choosing.

The Right to Complain

We will always try to maintain the highest standards and encourage the confidence our customers have in us as an organisation. In order that we can achieve this we do request that any complaints be first brought to our attention so we can properly investigate matters; if however you would like to complain about Dalet to a supervisory authority you may do so by contacting the Commission Nationale de l'Informatique et des Libertés at +33 1 53 73 22 22, or anyone of the other reporting methods listed on their website -

www.cnil.fr/en/contact-cnil

Our contact details

If you wish to get in touch with Dalet please do so with any of the following contact details:

DALET S.A.

16 rue Rivay

92300 Levallois-Perret

FRANCE

T: +33 1 41 27 67 00

@: privacy@dalet.com

Dalet Cookie Policy - Updated August 2018

About this Cookie Policy

This Cookie Policy explains what cookies are and how we use them. You should read this policy so you can understand what type of cookies we use, the information we collect using cookies and how that information is used. For further information on how we use, store and keep your personal data secure, see our [Privacy Notice](#).

This Policy also tells you what your rights are in relation to the personal data you give to us. If you have any questions about this Cookie Policy please contact us at the address above.

What are Cookies?

Cookies are little text files which are stored on the browser or hard drive of your computer or mobile device when you visit a webpage or application. Cookies work to make your experience browsing our site as smooth as possible and they remember your preferences so you don't have to insert your details again and again.

There are different types of cookies. Some cookies come directly from our website and others come from third parties which place cookies on our site. Cookies can be stored for varying lengths of time on your browser or device. Session cookies are deleted from your computer or device when you close your web-browser. Persistent cookies will remain stored on your computer or device until deleted or until they reach their expiry date. We may have several varieties of cookies which operate on our website:

Strictly Necessary Cookies

These cookies are necessary for the website to function and cannot be switched off in our systems. They are usually only set in response to actions made by you which amount to a request for services, such as setting your privacy preferences, logging in or filling in forms. You can set your browser to block or alert you about these cookies, but some parts of the site will not then work. These cookies do not store any personally identifiable information.

Performance Cookies

These cookies allow us to count visits and traffic sources so we can measure and improve the performance of our site. They help us to know which pages are the most and least popular and see how visitors move around the site. All information these cookies collect is aggregated and therefore anonymous. If you do not allow these cookies we will not know when you have visited our site, and will not be able to monitor its performance.

Targeting Cookies

These cookies may be set through our site by our advertising partners (youtube etc). They may be used by those companies to build a profile of your interests and show you relevant adverts on other sites. They do not store directly personal information, but are based on uniquely identifying your browser and internet device. If you do not allow these cookies, you will experience less targeted advertising.

How do you change cookie preferences or block cookies?

Within your browser you can choose whether you wish to accept cookies or not. Different browsers make different controls available to you. Generally, your browser will offer you the choice to accept, refuse or delete cookies at all times, or those from providers that website owners use i.e. third party cookies, or those from specific websites. Each browser's website should contain instructions on how you can do this.

For further information please refer to: <https://www.aboutcookies.org/how-to-delete-cookies/>

If you block cookies on our website, you may be unable to access certain areas of our website and certain functions and pages will not work in the usual way.